

Laurence M. Rosen (State Bar No. 219683)

**THE ROSEN LAW FIRM, P.A.**

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Attorneys for Plaintiff Brad Greenspan

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

JIM BROWN, individually and on behalf of all others similarly situated,	)	Case No. CV-06-3731 GHK (JTLx)
	)	
	)	<b>DECLARATION OF LAURENCE</b>
	)	<b>M. ROSEN IN SUPPORT OF</b>
Plaintiffs,	)	<b>CONSENTED TO MOTION FOR</b>
	)	<b>LEAVE TO WITHDRAW AS</b>
vs.	)	<b>COUNSEL</b>
	)	
BRETT BREWER, et al.	)	<u>CLASS ACTION</u>
	)	
	)	Judge: Hon. George H. King
Defendants.	)	Date: September 13, 2010
	)	Time: 9:30 a.m.
	)	Place: Courtroom 650

I, Laurence M. Rosen, declare:

1. I am an attorney duly licensed to practice in the State of California and before this Court. I am the managing shareholder of the Rosen Law Firm, P.A. ("Rosen"), attorneys for Brad Greenspan ("Greenspan").

2. I make this declaration in support of Rosen's consented to motion for leave to withdraw as counsel of record to Greenspan ("Motion to Withdraw").

1           3.     I have personal knowledge of the matters stated herein and if called  
2 as a witness, I could and would competently testify thereto.

3           4.     On behalf of Rosen, I agreed to represent Greenspan solely to file  
4 Greenspan's Notice of Appearance, which Rosen filed prior to agreeing on how,  
5 if at all, Rosen would represent Greenspan in this litigation after the Notice of  
6 Appearance was filed. The Notice of Appearance was filed as fast as possible in  
7 order to comply as closely as possible to the Court-ordered deadline to file a  
8 notice of appearance, which had already passed by the time Greenspan first  
9 discussed with me his retaining Rosen as counsel.

10          5.     Greenspan never paid me the legal fees for any legal work Rosen  
11 already did that Greenspan promised he would pay.

12          6.     Greenspan and Rosen have been unable to agree on the terms of a  
13 retainer agreement for Rosen to perform future legal work for Greenspan in this  
14 action.

15          7.     It is practically impossible for Rosen to represent Greenspan and to  
16 proceed to litigate on his behalf because he and Rosen are unable to agree on the  
17 strategy or plan for how to proceed and what steps to take in the litigation of this  
18 action.

19          8.     I told Greenspan repeatedly, beginning on July 26, 2010 -- over the  
20 telephone and repeatedly via email at bspan@earthlink.net (to which he sent  
21 reply e-mails), that if he did not execute a retainer agreement that I had provided  
22 to him, or some version of it, then Rosen would file the Motion to Withdraw.

23          9.     On July 30, 2010, I told Greenspan -- over the telephone and over  
24 email at bspan@earthlink.net (to which he sent a reply e-mail) -- that I would file  
25 the Motion to Withdraw.

26          10.    On July 30, 2010, Plaintiff Jim Brown and all Defendants consented  
27 to the Motion to Withdraw when they answered my emails to them asking if they  
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1 would consent to Rosen's filing the Motion to Withdraw by stating that they had  
2 no objection.

3 DATED: August 2, 2010

4 /s/ Laurence Rosen  
5 Laurence M. Rosen, Esq.  
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